



- Exhibit 30: Declaration of Michael Novak, Vice President, Controlling at FCA US LLC.
- Exhibit 32: Declaration of Lawrence Joseph Lines III on behalf of General Motors LLC.
- Exhibit 34: Declaration of Mark Willoughby, Division Manager, North American Purchasing at Honda North America, Inc.
- Exhibit 35: Declaration of Barron Umemoto, Manager, Pricing and Cross Brand Group for American Honda Motor Co., Inc.
- Exhibit 36: Declaration of Andrea Whobrey, ISD Manager for Auto applications at Honda North America.
- Exhibit 37: Declaration of Louis Augello, Auto Sales Honda Business Operations Manager at American Honda Motor Co., Inc.
- Exhibit 39: Declaration of Mickey Phillips, Senior Manager of Cost Management and Finance of Hyundai Motor Manufacturing Alabama, LLC.
- Exhibit 40: Declaration of David P. Mark, Senior Manager of Parts Development of Hyundai Motor Manufacturing Alabama, LLC.
- Exhibit 41: Declaration of Mark Torigian, General Counsel, Legal Department of Hyundai America Technical Center, Inc.
- Exhibit 42: Declaration of Smith Reynolds, Executive Director at Hyundai AutoEver America, LLC.
- Exhibit 44: Declaration of Sandy Zielomski, Senior Group Manager for Customer Connect at Hyundai Motor America.
- Exhibit 45: Declaration of Ryan Donnelly on behalf of Hyundai Motor America.
- Exhibit 46: Declaration of Michael DePaul, Senior Group Manager for Incentives at Hyundai Motor America.
- Exhibit 49: Declaration of Mark Sullivan, Senior Manager, General Accounting of Kia Motors Manufacturing Georgia, Inc.
- Exhibit 50: Declaration of Kevin Kinsey, Senior Manager of the Procurement Subdivision of Kia Motors Manufacturing Georgia, Inc.
- Exhibit 55: Declaration of Dave Oehmke, Manager Purchasing Strategy and Systems at Nissan North America, Inc.

- Exhibit 56: Declaration of Mohan Rao, Ph.D. on behalf of Nissan North America, Inc.
- Exhibit 65: Declaration of Audrey T. Mito on behalf of Toyota Motor Sales, U.S.A., Inc.
- Exhibit 66: Declaration of Shayne K. Carter on behalf of Toyota Motor Sales, U.S.A., Inc.
- Exhibit 67: Declaration of Denise Morgan on behalf of Toyota Motor Engineering & Manufacturing North America.
- Exhibit 68: Declaration of David Ostreicher on behalf of Toyota Motor Engineering & Manufacturing North America.
- Exhibit 69: Declaration of Susan Weis on behalf of Toyota Motor Engineering & Manufacturing North America.
- Exhibit 70: Declaration of Patrick Hannon for Volkswagen Group of America, Inc.
- Exhibit 71: Declaration of Christian Schroth for Volkswagen Group of America, Inc. d/b/a Audi of America

Paragraph 19 of the Protective Order provides that “this Order shall serve as a stipulated order for purposes of Civil Local Rule 5.3(b)” and requires all materials containing “Confidential Information or Highly Confidential Information” (as defined in the Protective Order) to be filed under seal according to the procedures contained in the Protective Order. *See* Protective Order ¶7. The Protective Order also applies “to non-parties.” *See* Protective Order ¶19. The SSEs have determined in good faith that the Sealed Exhibits contain confidential and proprietary information that meets the Protective Order’s definitions of “Confidential” or “Highly Confidential—Outside Attorneys Only” information.<sup>3</sup> No means other than sealing will preserve the confidentiality of the SSEs’ confidential business information.

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<sup>3</sup> If the Court has remaining questions about whether sealing is appropriate for the material in the exhibits, the SSEs offer to present the material to the court for an *in camera* review.

Dated: February 19, 2016

Respectfully submitted,

BUSH SEYFERTH & PAIGE PLLC

By: /s/ Cheryl A. Bush

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Attorneys for FCA US LLC and Fiat Chrysler  
North America, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 19, 2016. Any other counsel of record will be served by first class mail.

By: /s/ Cheryl A. Bush